

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
GREEN COPPER HOLDINGS, LLC)	CASE NO. 25-10088-M
EIN # xx-xxx9708)	Chapter 7
)	
)	
Debtor.)	

**TRUSTEE’S EMERGENCY MOTION TO EMPLOY CONSULTANT TO SECURE
PREMISES AND MOTION TO WAIVE 21-DAY RULE PURSUANT TO FED. R.
BANKR. P. 6003**

Comes now the Trustee and states:

1. The principal asset of this estate is an iconic structure known as the Price Tower in Bartlesville, Oklahoma.
2. As of the date of bankruptcy, this facility had ceased operating; was vacant; uninsured; and the utilities had been turned off.
3. The Trustee has taken steps to obtain a set of keys to the premises and an inspection of the interior of the premises. There is flooding in certain areas of the facility. The Trustee is working with third parties to secure reinstatement of the utilities and possibly obtain insurance for the premises.
4. In order to prevent immediate and/or irreparable harm, the Trustee seeks to employ Michelle Johnson of Liquidation Specialists LLC 103 S. JM Davis Blvd., Claremore, Okla 74017 (“Johnson”). Johnson is a licensed real estate broker and an experienced auctioneer. She has been employed in hundreds of bankruptcy cases and is experienced in matters

related to securing commercial properties, including changing locks, securing utilities, and property insurance if possible.

5. Johnson is not a creditor and does not hold or represent an interest adverse to the estate.

Johnson does not have any connection to the U.S. Trustee's office and is a disinterested person as defined by the bankruptcy code. Attached as **Ex A** is Johnson's Affidavit of Disinterested Person.

6. Johnson's hourly rate is \$125/hr.

Wherefore the Trustee prays for an order waiving the 21-day rule set forth in Fed. R. Bankr. P 6003 and. authorizing him to employ Johnson for the reasons stated herein and pursuant to the proposed specified hourly rate.

Respectfully Submitted By:

s/ Patrick J. Malloy III
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